UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TONY KHOURY, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

VS.

FXCM INC., DROR NIV and ROBERT
LANDE,

Civil Action No. 1:17-cv-00916-RA

CLASS ACTION

CLASS ACTION

YING ZHAO, Individually and on Behalf of All Others Similarly Situated,

Civil Action No. 1:17-cv-00955-UA

Defendants.

Plaintiff, : <u>CLASS ACTION</u>

FXCM INC., DROR NIV and ROBERT N. LANDE,

Defendants.

DAVID BLINN, Individually and on Behalf of : Civil Action No. 1:17-cv-01028-RA All Others Similarly Situated, :

: <u>CLASS ACTION</u>

Plaintiff,

VS.

VS.

FXCM INC., DROR NIV and ROBERT N. LANDE,

Defendants.

DECLARATION OF DAVID A. ROSENFELD IN SUPPORT OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

I, DAVID A. ROSENFELD, declare as follows:

1. I am an attorney duly licensed to practice before the courts of the State of New York

and this Court. I am a member of Robbins Geller Rudman & Dowd LLP, one of the proposed Lead

Counsel for proposed Lead Plaintiff Moshe Ariel ("Mr. Ariel") in the above-captioned actions. I

make this declaration in support of Mr. Ariel's Motion for Consolidation, Appointment as Lead

Plaintiff, and Approval of Lead Plaintiff's Selection of Lead Counsel. I have personal knowledge of

the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: Notice of pendency of class action published on *Business Wire* on February

7, 2017;

Exhibit B: Mr. Ariel's Certification;

Exhibit C: Mr. Ariel's loss estimate, prepared by counsel;

Exhibit D: Robbins Geller Rudman & Dowd LLP's firm résumé; and

Exhibit E: Johnson & Weaver, LLP's firm résumé.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th

day of April, 2017, at Melville, New York.

DATED: April 10, 2017

/s/ David A. Rosenfeld
DAVID A. ROSENFELD

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CERTIFICATE OF SERVICE

I, David A. Rosenfeld, hereby certify that on April 10, 2017, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

/s/ David A. Rosenfeld DAVID A. ROSENFELD